

July 8, 2009

The Honorable Peter DeVries, Council Chair
Washington State Building Code Council
128 10th Avenue SW
PO Box 42525
Olympia, WA 98504-2525

Subject: WSEC 2009 Proposal 09-139

Dear Chairman DeVries:

I am writing in full support of Joe Andre's letter protesting the reversal of the original modification of proposal 09-139 by the Energy Code Technical Advisory Group (TAG). Mr. Andre has addressed the legal issues thoroughly, and would like to add some background on the technical issues involved. As the lighting community's representative on the TAG, I feel it is important to provide you with information about the energy and sustainability issues involved.

The original proposal required that 50% of the lamps in residential projects be "high efficiency", allowing "screw-in" compact fluorescent lamps to qualify. The TAG modified the proposal to require that 50% of the fixtures be high efficiency instead of the lamps.

This is a very important consideration when addressing both energy and wider sustainability issues. If the lamps qualify by themselves, then the fixtures will have standard medium base sockets which will allow the use of incandescent lamps when replacing the bulb. That will negate the energy savings. Since the incandescent lamps are substantially cheaper than the screw-in compact fluorescent lamps, that is a very likely scenario. Additionally, disposal of screw-in compact fluorescent lamps includes disposal of both the lamp and ballast which is not the most sustainable way to convert residences to energy efficient lighting.

The use of high efficiency fixtures instead of lamps means that the ballast is included in the fixture. The lamps can be changed independently of the ballast and cannot be replaced with incandescent lamps. The energy savings continues over time and the disposal issue is greatly reduced. This is the reason that the TAG wholeheartedly supported the modification of the proposal. It is also why the Council should disregard the action taken Friday and consider the proposal as originally modified.

I and the rest of the lighting design community in Washington State fully support the efforts to increase energy savings with the code in a responsible and technically adept manner, and have a high level of respect for the process by which that happens. As Mr. Andre states, the manner in which this TAG recommendation was reversed subverts the nature of that process. I highly recommend that you pass the proposal as amended April 17, 2009 by the TAG.

The Honorable Peter DeVries, Council Chair

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Thank you very much for your time and consideration on this matter.

Sincerely,

A handwritten signature in dark ink, reading "Mary Claire Frazier". The signature is fluid and cursive, with the first name "Mary" and last name "Frazier" clearly legible.

Mary Claire Frazier, IALD, IESNA, LEED®AP
Principal
CANDELA

cc Kristen Clayton, Energy Code TAG Co-Chair
Donald Jordan, Energy Code TAG Co-Chair
Tim Nogler, Managing Director, Building Code Council
Krista Braaksma, Codes Specialist, Building Code Council
Joe Andre, NEMA